

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMC CORPORATION, EMC )  
INTERNATIONAL COMPANY, and EMC )  
INFORMATION SYSTEMS )  
INTERNATIONAL, )  
Plaintiffs, )  
v. ) C.A. No. 13-1985-RGA  
PURE STORAGE, INC., )  
Defendant. )

**DEFENDANT'S UNOPPOSED MOTION TO AMEND ANSWER**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Defendant Pure Storage, Inc. hereby moves for leave to amend its answer. The grounds for this motion are as follows:

1. On June 6, 2014, EMC filed an amended complaint. On June 13, 2014, Pure Storage filed its answer to EMC's amended complaint.
2. EMC then asked Pure Storage to amend its answer to provide further detail to Pure Storage's laches, unclean hands, and inequitable conduct defenses.
3. After meeting and conferring, EMC has advised Pure Storage that it does not oppose this motion seeking leave to file the Pure Storage's amended answer, as attached hereto as Exhibit A.

WHEREFORE, Defendant Pure Storage, Inc. respectfully requests the Court to enter the attached order and to deem Pure Storage's amended answer filed as of the date of the order is entered.

Respectfully submitted,

OF COUNSEL:  
Robert A. Van Nest  
Ashok Ramani  
Matthew Werdegar  
Adam Lauridsen  
Daniel W. Gordon  
KEKER & VAN NEST LLP  
633 BATTERY STREET  
SAN FRANCISCO, CA 94111  
(415) 391-5400

*/s/ John W. Shaw*  
John W. Shaw (No. 3362)  
SHAW KELLER LLP  
300 Delaware Avenue, Suite 1120  
Wilmington, DE 19801  
(302) 298-0700  
jshaw@shawkeller.com  
Attorneys for Defendant Pure Storage, Inc.

Dated: August 1, 2014

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMC CORPORATION, EMC )  
INTERNATIONAL COMPANY, and EMC )  
INFORMATION SYSTEMS )  
INTERNATIONAL, )  
Plaintiffs, )  
v. ) C.A. No. 13-1985-RGA  
PURE STORAGE, INC., )  
Defendant. )

**ORDER**

At Wilmington this \_\_\_\_ day of \_\_\_\_\_, 2014, defendant Pure Storage, Inc. having filed an unopposed motion seeking leave to file an amended answer in the form attached to its motion, IT IS HEREBY ORDERED that:

1. The motion is granted.
2. The amended answer attached to the motion as Exhibit A is deemed filed as of the date of this Order.

---

United States District Judge